



January 31, 2022

***Via ECFS***

Marlene H. Dortch, Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

***Re: Advanced Methods to Target and Eliminate Unlawful Robocalls, CG Docket No. 17- 59; Call Authentication Trust Anchor, WC Docket No. 17-97***

Dear Ms. Dortch:

First Orion Corp. submits this letter in relation to the Fifth Further Notice of Proposed Rulemaking in CG Docket No. 17-59 & Fourth Further Notice of Proposed Rulemaking in WC Docket No. 17-97 (“FNPRM”) issued by the Federal Communications Commission (“Commission”).<sup>1</sup>

In the FNPRM, the Commission asks among other things whether it should further define what constitutes “reasonable analytics”<sup>2</sup> for the purpose of call blocking authorizations. First Orion wishes to reiterate its position on this issue as reflected in previous commentary in the record: that particularly as it relates to blocking by terminating providers, further definition is not only unnecessary and unwarranted given consumer choice and preference but also harmful in that it could potentially reveal methodologies, stifle innovation and inhibit the flexibility needed to rapidly adjust to ever-changing tactics of those making illegal calls.<sup>3</sup>

Sincerely,

/s/ John Ayers  
First Orion Corp.  
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(202) 494-4063

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<sup>1</sup> *Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor*, CG Docket No. 17-59 and WC Docket No. 17-97, Fifth Further Notice of Proposed Rulemaking in CG Docket No. 17-59 & Fourth Further Notice of Proposed Rulemaking in WC Docket No. 17-97, FCC 21-105 (rel. Oct. 1, 2021) (“FNPRM”).

<sup>2</sup> *Id.* at ¶ 70.

<sup>3</sup> Comments of First Orion Corp., WC Docket No. 17-97, WC Docket No. 20-67, at 1-3 (filed May 29, 2020) (citing *Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor*, CG Docket No. 17-59 and WC Docket No. 17-97, Declaratory Ruling and Third Further Notice of Proposed Rulemaking, FCC 19-51, ¶ 34 (rel. June 7, 2019).